

# HEAD START TRIBAL CONSULTATION

July 21, 2008  
Kansas City, Missouri

## EXECUTIVE REPORT



OFFICE OF HEAD START  
ADMINISTRATION FOR CHILDREN AND FAMILIES  
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES



## CONTENTS

---

Consultation Participants .....	1
Tribal Concerns & Recommendations .....	3
Testimony.....	5

## APPENDICES

A. Agenda.....	9
B. Improving Head Start for School Readiness Act of 2007: PowerPoint Presentation ....	10
C. Head Start Performance Standards: PowerPoint Presentation.....	24
D. Monitoring Findings.....	30

## CONSULTATION PARTICIPANTS

---

### TRIBAL PARTICIPANTS

**Hope Adame**, Head Start, Early Head Start Director, Prairie Band Potawatomi Nation, Kansas

**Susanna Barnett**, Partnership Specialist, Muscogee (Creek) Nation, Oklahoma

**Kevin Cornelius**, Legislative Affairs, Oneida Nation of Wisconsin

**Vanessa Harlan**, Head Start Director, Omaha Tribe of Nebraska

**Louis Hicks**, Director of Human Development, Muscogee (Creek) Nation, Oklahoma

**Kathy Hughes**, Tribal Council Member, Oneida Tribe of Indians of Wisconsin

**Felix Kitto**, Tribal Council Member, Santee Sioux Nation, Nebraska

**Joe McCauley**, Policy Council Member, Omaha Tribe of Nebraska

**Jeff Miller**, Acting Chief Technical Officer, Omaha Tribe of Nebraska

**Jackie Mitchell**, Tribal Council Member, Prairie Band Potawatomi Nation, Kansas

**Charles Noble Rice**, Tribal Council Member, Winnebago Tribe of Nebraska,

**John Pavek**, Director, Oneida Nation of Wisconsin

**Joaquin Quintana-Yates**, Head Start Director, Eight Northern Indian Pueblos Council (ENIPC), New Mexico

**Cynthia Reiter**, Early Childhood Program Assistant, Menominee Nation, Wisconsin, Designated Tribal Representative

**Ruth A. Sampson**, Tribal Council Member, Reno-Sparks Indian Colony, Nevada

**Amen Sheridan**, Omaha Tribe of Nebraska, Tribal Council Member

**Michael Skenadore**, Early Childhood Program Director, Menominee Nation, Wisconsin, Designated Tribal Representative

**Darwin Snyder**, Tribal Council Member, Winnebago Tribe of Nebraska

**Patricia Ward-Sheridan**, Policy Council Member, Omaha Tribe of Nebraska

**Regina Washinawatok**, Tribal Council Member, Menominee Indian Tribe of Wisconsin

**Patricia Wind**, Head Start Manager, Muscogee (Creek) Nation, Oklahoma

## OHS PARTICIPANTS

**Patricia Brown**, Acting Director, Office of Head Start (OHS), Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS)

**Amanda Bryans**, Director, Educational Development and Partnerships Division, OHS, ACF, HHS

**Ann Linehan**, Director, Quality Assurance Division, OHS, ACF, HHS

**Renée Perthuis**, Director, Program Operations Division, and Acting Regional Program Manager, American Indian/Alaska Native Region XI, OHS, ACF, HHS

**Craig Turner**, Director, Budget and Policy Division, OHS, ACF, HHS

## ADDITIONAL ATTENDEES

**Lynda Bitner**, Head Start Manager, ACF Regional Office—Kansas City

**Toni Dobrec**, Senior Manager, National Indian Head Start Directors Association (NIHSDA) Management Consultant Services, Oklahoma

**Mike Factor**, Grant Officer, ACF Regional Office—Kansas City

**Kathryn Heisel**, Senior Manager, NIHSDA Management Consultant Services, Oklahoma

**Pamela Lucas**, Program Specialist, ACF Regional Office—Kansas City

## TRIBAL CONCERNS & RECOMMENDATIONS

---

The Office of Head Start held its first FY 2008 Tribal Consultation on July 21, 2008, in Kansas City, Missouri. The purpose of the consultation session was to discuss ways to better meet the needs of Indian, including Alaska Native, children and their families, taking into consideration funding allocations, distribution formulas, and other issues affecting the delivery of Head Start services in their geographic locations. Concerns and recommendations shared by tribal leaders and other participants are highlighted below.

### **Tribal Sovereignty**

- Tribes emphasized sovereignty and the need to respect the sovereign status of Indian Nations, particularly in the areas of redesignation and governing boards.

### **Curriculum and Culture**

- Tribes voiced concern over the curriculum that is scientifically based, but may lack sensitivities toward culture. Indian language and culture may not have been considered in the research evaluating the curriculum.
- Tribes should be allowed to develop their own specific curriculum around language and culture.
- Models of other successful native language/dual language programs for children would be useful. Training in this area would also be helpful.

### **Conversion**

- The decision to convert slots from Head Start to Early Head Start should remain at the tribal level.
- A template/training module to help tribes in making the decision to convert—including the costs and consequences involved—would be helpful. It could be made available online. Tribes already involved in this area could contribute to the development of such a tool.

### **Staff Qualifications and Technical Assistance (TA)**

- Tribes voiced a concern about funding in support of requirements for teacher certifications.
- Concern was raised about adequate compensation for teachers to avoid attrition.
- The high rate of turnover of Head Start directors in tribal programs was also a concern. There is a need for specific TA and mentoring for new directors.
- Tribes felt that the quality of TA currently being provided was inconsistent.

## **Risk Management**

- Assessment of the value of risk management was mixed.
- Telephone conference calls for risk management were considered adequate, but face-to-face meetings were preferred.

## **Monitoring**

- Reviewers are not always knowledgeable of tribal culture.
- Feedback provided onsite is not always consistent with the final report.
- There is a need to monitor reviewer quality.
- There should be fewer Program Performance Standards, and they should be less prescriptive.

## **Re-designation**

- Tribes are concerned about the potential for non-Indian agencies competing for a Head Start program. A non-Native agency may not be allowed to operate on tribal lands.
- Non-Native agencies would not be able to adequately teach Indian language and culture.

## **Research**

- The new Act requires the Secretary of the Department of Health and Human Services to work in collaboration with other entities, including tribal governments, to:
  - Undertake a study or set of studies, focusing on the AIAN-eligible population, to address such issues as curriculum development, availability and need for services, appropriate research methodologies and measures for these populations, and best practices for teaching and educating American Indian and Alaska Native Head Start children;
  - Accurately determine the number of children nationwide who are eligible to participate in Indian Head Start programs each year;
  - Document how many of these children are receiving Head Start services each year; and
  - To the extent practicable, ensure that access to Indian Head Start programs for eligible children is comparable to access to other head Start programs for other eligible children.

Participants in the tribal consultation wanted all Indian children included in the research. Specifically, they believed the needs assessment should include children who exceed income eligibility guidelines and those in Tribes that do not currently have a Head Start program.

## **Tribal Consultation**

- More advance notice would be helpful and would facilitate participation.
- Consultation sessions in each region where there are Tribal grantees would also be helpful.

### HEAD START TRIBAL CONSULTATION TESTIMONY PRESENTED BY

KATHY HUGHES

VICE-CHAIRWOMAN

ONEIDA TRIBE OF INDIANS OF WISCONSIN

JULY 21ST, 2008

#### INTRODUCTION

On behalf of the Oneida Tribe of Indians of Wisconsin, I appreciate the opportunity to participate in this Consultation Meeting. Like many other tribal leaders and tribal Head Start professionals, we have traveled a great distance to participate in this consultation. Thus, it is my sincere hope that this gathering will truly be a consultation and not just a listening session. All of us feel passionate about the importance of the Head Start program for our communities. Consultation involves listening but it also involves working to address the issues or concerns that we bring up with the program and reinforcing the practices that work for the Tribal Head Start programs. So, I ask that you not only listen but work with us to address the issues we bring up today because I firmly believe that all of us are committed to making Tribal Head Start programs be the best they can be for our communities. This will take creativity and a willingness to solve problems and not just impose regulation.

The Oneida Tribe has several areas that we would like to highlight:

#### GOVERNING BODY

Like many other tribes, the Oneida Head Start Governing Body is our tribal council (or Business Committee under our Constitution). However, the Head Start Act of 2007 establishes new membership qualifications for Head Start governing bodies, specifically the inclusion of members with fiscal management, legal, and early childhood education backgrounds. As an elected body, the tribal council is

As with any program there is likely to be some funding unallocated within Indian Head Start, We believe that unallocated funding should only be reallocated within Indian Head Start. This funding was specifically set aside for Tribal programs and should remain available to other Tribal programs.

Most important for the Oneida Tribe, the expansion funding should also be allowed to be used for Early Head Start programs. It is our understanding that as outlined in the Joint Explanatory Statement, the Act was intended to provide an expansion to both the Head Start and Early Head Start programs. For the Oneida Tribe, we see the most beneficial way to use the expansion funding for our community is to provide Early Head Start services. While we believe this to be the intent of the Act, we ask that this be adopted as policy.

#### PROGRAM QUALITY

As with any other tribe, the Oneida Tribe remains concerned about program quality. Our Tribal Head Start program has worked very hard to achieve a high level of quality in its service.

We believe that reviews of the program by the Department are an essential component of maintaining program quality. However, as a principle of the government to government relationship, it is absolutely necessary that on site reviews be led by a current employee of HHS. In addition, to provide a more culturally appropriate review, we encourage the recruitment of Indian reviewers with familiarity with Tribal Head Start programs.

In addition, we cannot emphasize the importance of having high quality Program Specialists. Currently, Oneida has an exceptional Program Specialist working with the tribe. It has not always been so. The position should be filled by someone with a strong educational background and experience working in Indian Country.

Another point of concern is the increased education requirements for teachers without the requisite funds to pay for either the education or to provide competitive salaries for degreed teachers. While the Oneida Tribe believes strongly in hiring the most qualified teachers and professionals for its program, this unfunded mandate has serious consequences for our programs. Already, the Oneida Head Start has lost 2 degreed

teachers due to our lack of ability to be competitive with salaries.

A position that the Act does not consider for a higher degree requirement is the Family Service Worker, but it should. For the last four years, Oneida has required a Bachelor's Degree for its Family Service Workers, and we have seen a marked improvement in our service to parents because of this requirement. Although we believe in this requirement, we are again concerned about mandating degree requirements without additional funding.

## CULTURE & LANGUAGE PRESERVATION

The Oneida Tribe believes strongly in providing our Head Start children with a strong foundation in the Oneida culture and language. Currently, the Oneida Head Start program works with our Language Preservation program on an appropriate cultural and language curriculum for our children. We would recommend that any policy with respect to culture and language should respect the ability of the tribe to provide the appropriate curriculum and not be based on an external based curriculum.

## TRANSPORTATION

In the past, parents bringing their children to Head Start in their vehicles could be counted as an "in-kind" donation, but this is no longer the case. While transportation for children is viewed as a cost of the program, the provision of that service by parents is no longer recognized as a contribution. Given the lack of federal funding for transportation and the often long travel distances required for children to attend Head Start, we believe this policy should be reversed.

## REPORTS

The Act calls for an Indian Head Start Facilities report to be conducted every five years. When would you foresee work on this report to be conducted? How is that report to be used? Will that report be made public?

## CONCLUSION

Thank you for the opportunity to present our views for this consultation session. I am hopeful that you will take my comments and the comments of the other tribes here

today as a call to work together to improve the Head Start program. For us, this program is too important for us to not work hard to make it work the best it can for our children. Thank you and I look forward to working with you in the future.

**TRIBAL CONSULTATION MEETING**

July 21, 2008  
Kansas City, MO

**AGENDA**

8:30 A.M.

**TRIBAL OPENING**

**WELCOME**

*Patricia Brown, Acting Director, Office of Head Start (OHS)*  
*Jackie Mitchell, Tribal Council Member, Prairie Band Potawatomi Nation*

**INTRODUCTIONS**

*Patricia Brown, facilitator*

**REGIONAL DISCUSSION**

*Renée Perthuis, Director of Program Operations and Acting Regional  
Program Manager, American Indian/Alaska Native Region XI, OHS*

**TRIBAL INPUT**

**HEAD START REAUTHORIZATION**

*Craig Turner, Director of Budget and Policy, OHS*

**TRIBAL INPUT**

12:00 P.M.

**LUNCH**

1:00 P.M.

**PROGRAM PERFORMANCE STANDARDS & RESEARCH**

*Amanda Bryans, Director of Educational Development and  
Partnerships, OHS*

**TRIBAL INPUT**

**MONITORING & TECHNICAL ASSISTANCE**

*Ann Linehan, Director of Quality Assurance, OHS*

**TRIBAL INPUT**

**ADDITIONAL DISCUSSION**

*Patricia Brown, Facilitator*

5:00 P.M.

**WRAP UP & ADJOURNMENT**

*Patricia Brown, Facilitator*

## Improving Head Start for School Readiness Act of 2007

P.L. 110-134

Craig Turner  
Director of Policy and Budget Division  
Office of Head Start

## Grantee Designation

- Grants will be for a 5-year period
- A review panel appointed by the Secretary will make recommendations on the implementation of a new system for re-designation of grantees.
- 18-36 month time frame for implementation

## Grantee Designation (continued)

- If an AIAN grantee is found to not be delivering high-quality services, the tribe and HHS will establish a plan to improve program quality. This plan must be implemented within a 6-month period.
- If after 6 months the grantee is still not delivering high-quality services, there will be a competition for the Head Start grant.
- A non-Indian Head Start agency may not be funded to operate a Head Start program unless there is no Indian Head Start agency in the community. If that is the case, the non-Indian agency would operate only until an Indian agency became available.

3

## Funding Allocation

All grantees must get the prior year's base funding level unless appropriation is less than the prior year.

If there are increased funds:

- T/TA is 2 ½% to 3% of the increase
- Grantees get COLA equal to the prior year increase in CPIU, if there are sufficient funds
- **Indian and migrant programs get \$10 million, or if a full COLA is not possible, 5% of any increase**
- **Special Expansion to AIAN and MSHS is capped at \$50 million for each**
- **AIAN grantees get 3% of expansion funds in future years**

4

## Funding Allocation (continued)

Of any remaining funds:

- **Quality Improvement** – 40% (45%)
- **Expansion** – 45% (55%)
  - Split equally between Head Start and EHS
- **State Advisory Councils** – 15%

5

## Homeless Children

- Homeless children are categorically for Head Start
- OHS will issue regulations regarding the participation and prioritization of homeless children in Head Start programs

6

## Children Above Poverty Line

- Grantees may serve up to 35% of their enrollment with children whose incomes are between 100% to 135% of poverty. (This is in addition to the current 10% over-income.)
- **AIAN grantees can continue, in certain circumstances, to serve up to 49% of their enrollment from children not meeting the income eligibility criteria.**
- Grantees doing so must demonstrate they have met the needs of the low-income population.

7

## Enrollment

- Grantees can propose to convert current Head Start slots to EHS slots.
- Grantees can propose to convert current part-day slots to full-day slots.
- Grantees can propose enrollment reductions.
- Grantees are to maintain “an active waiting list”.
- **AIAN grantees who run HS and EHS programs may re-allocate funds between HS and EHS.**

8

## Children With Disabilities

- The current regulatory requirement that 10% of enrolled children has been modified and incorporated into law.
- 10% of enrolled children (not enrollment opportunities) must be for children with disabilities
- Grantees may receive a waiver, but only for up to 3 years.

9

## Curricula

- All curricula must be based on scientifically valid research and be age and developmentally appropriate.

10

## Standards/Measures

- OHS to review and, as appropriate, revise the Performance Standards.
- OHS to provide guidance to grantees on the use of scientifically based measures.

11

## Monitoring

- Teams do not have to be led by federal team leaders.
- Reviews are to use a valid and reliable research-based observational instrument to assess classroom quality.
- The time period for correcting non-compliance findings is 120 days.
- Program strengths are to be included in the monitoring report.

12

## Consultation

- Annual consultation in each region with tribal governments
- Consultation with tribes as part of developing any revisions to the Performance Standards

13

## Collaboration/Coordination

- Grantees must enter into a MOU with the agency in its community (if any) that administers state pre-K.
- Grantees must collaborate with LEAs to ensure an orderly transition from Head Start to kindergarten.
- Grantees are to conduct community outreach to “generate support and leverage resources...”

14

## Collaboration (continued)

- New roles have been assigned to the State Collaboration Directors.
- *A collaboration grant must be funded for AIAN programs.*

15

## State Advisory Councils

- Each governor to establish a State Advisory Council. *Governors should, to the extent possible, include a representative of the AIAN programs in the state.*

16

## Staff Qualifications

- By 9/30/2010: 100% of EHS teachers with CDA
- By 9/30/2011: 100% of teachers with AA\*
- By 9/30/2013:
  - **100% of Ed. Coordinators with BA**
  - **50% of teachers with BA**
  - **100% of teacher assistants with CDA\***

\*waivers may be granted

17

## T/TA

- T/TA is 2½% to 3% of the total Head Start appropriation
  - At least 50% of T/TA funds go directly to grantees.
  - At least 25% of T/TA funds are to be used for a state-based T/TA system.
  - **AIAN grantees will be served by a region-wide T/TA system.**

18

## T/TA (continued)

T/TA priorities now include:

- training and career development needs of staff related to literacy activities & parent involvement,
- prevention of childhood obesity,
- improving services to homeless children,
- improving services to LEP children,
- increasing family literacy and parenting skills,
- meeting the needs of rural families, etc.

19

## T/TA Tribal Colleges

- T/TA funds may be used to fund tribal colleges that would use these funds to increase the number of Head Start staff with degrees in early childhood education or related fields.
- Tribal Colleges could also be funded to develop curricula that would help Head Start staff develop the skills and expertise needed to teach in programs serving large numbers of Indian children, including programs concerning tribal culture and language.

20

## Staff Training

- All teachers must attend at least 15 hours of professional development each year.
- Each agency must develop a professional development plan for all full-time staff.
- Teachers that receive financial assistance for college must agree to work in Head Start for three years or repay assistance.

21

## Grantee Management

- Agencies are to develop procedures for on-going monitoring.
- Each agency is to conduct a comprehensive self-assessment of its effectiveness and progress in meeting program goals.
- Improvement plans are required for programs needing improvement.
- New requirements for governing board membership.
- Specific functions are given to both the Board and the Policy Council.

22

## Grantee Reports

- Annual reports to OHS on:
  - Administrative expenses
  - Progress in meeting teacher degree requirements
  - Program improvement plan to strengthen weaknesses identified in the self assessment
  - Demographics, outreach, enrollment and other practices, if serving additional children up to 130% of poverty
- A copy of its audit management letter and any audit findings related to Head Start to OHS
- Monthly enrollment reports to OHS

23

## Annual Report to Public

- Grantees are required to make an annual report on program operations available to the public.
- The report must include information on funding sources, budget, enrollment, monitoring reviews, audits, medical and dental screenings, parent involvement activities, and agency efforts to prepare children for school and any other information required by HHS.

24

## Under-Enrollment

- Grantees will report monthly on enrollment.
- On a semi-annual basis OHS shall:
  - determine which agencies are under-enrolled,
  - develop a plan for reducing or eliminating under-enrollment with such agencies, and
  - provide technical assistance.
- If after 12 months of TA, an agency is less than 97% enrolled, OHS may recapture or reduce the base grant.

25

## Studies

- A study of limited English proficient children and their families
- **A study of the unmet need for American Indian and migrant/seasonal children**
- A study of Head Start programs' preparedness to deal with emergencies

26

## Centers of Excellence

- OHS to establish up to 200 Centers of Excellence (subject to appropriation of funds).



## Head Start Program Performance Standards

### Mile Markers to Quality

## History

What are Head Start Performance Standards?

What is the historical impact of the Standards?

---

## Current Configuration

Part 1304-Program Performance Standards for  
the Operation of Head Start Programs by  
Grantee and Delegate Agencies

---

---

## Current Configuration

Subparts:

- A - **General** (purpose and scope, effective date, definitions)
  - B - **Early Childhood Development and Health Services**  
(health, education, development, safety, nutrition, mental health)
  - C - **Family and Community Partnerships**
  - D - **Program Design and Management** (governance, systems and procedures, human resources, facilities, materials and equipment)
  - E - **Implementation and Enforcement** (deficiencies and quality improvement plans, noncompliance)
-

---

## **Part 1305 – Eligibility, Recruitment, Selection, Enrollment, and Attendance in Head Start**

- Purpose and scope
  - Definitions
  - Community strengths and needs
  - Age and income eligibility-AIAN exception
  - Recruitment
  - Selection
  - Enrollment
  - Attendance
  - Policy of fees
  - Compliance
- 

---

## **Part 1306- Head Start Staffing Requirements and Program Options**

Subparts:

- **A-General** (purpose and scope, effective dates, definitions)
  - **B-Head Start Program Staffing Requirements** (staffing patterns, qualification requirements, volunteers, training)
  - **C-Program Options** (provision of comprehensive services, selecting an option, center based, home-based, combination, additional program options)
-

---

## **Part 1308- Head Start Program Performance Standards on Services For Children With Disabilities**

- **Subpart A- General** (purpose, scope, definitions)
  - **Subpart B –Disabilities Service Plan** (purpose and scope of plan)
  - **Subpart C- Social Services Performance Standards** (recruitment and enrollment of children with disabilities)
  - **Subpart D- Health Services Performance Standards** (assessment of children, eligibility criteria for specific diagnoses)
  - **Subpart E- Education Performance Standards** (IEPs)
  - **Subpart F- Nutrition Performance Standards**
  - **Subpart G- Parent Involvement Performance Standards** (parent involvement and nutrition)
- 

---

## **OHS Experience**

- Monitoring
  - Policy Clarifications
  - Research
  - Anecdotes
-

---

## Teacher Child Interaction

- Valid, Reliable measure required by statute for monitoring
  - Essential element of professional development
- 

---

## Parameters

- Provide feedback about impact of current regulations on Tribal Head Start programs
  - Offer recommended changes
  - Regulations will not include guidance
-

---

## Process

- Statute provides authority to regulate
  - OHS consults with experts
  - Draft regulations are developed
  - Notice of Proposed Rule Making is published in Federal Register
  - Public comments
  - OHS responds via publication of final rule
- 

---

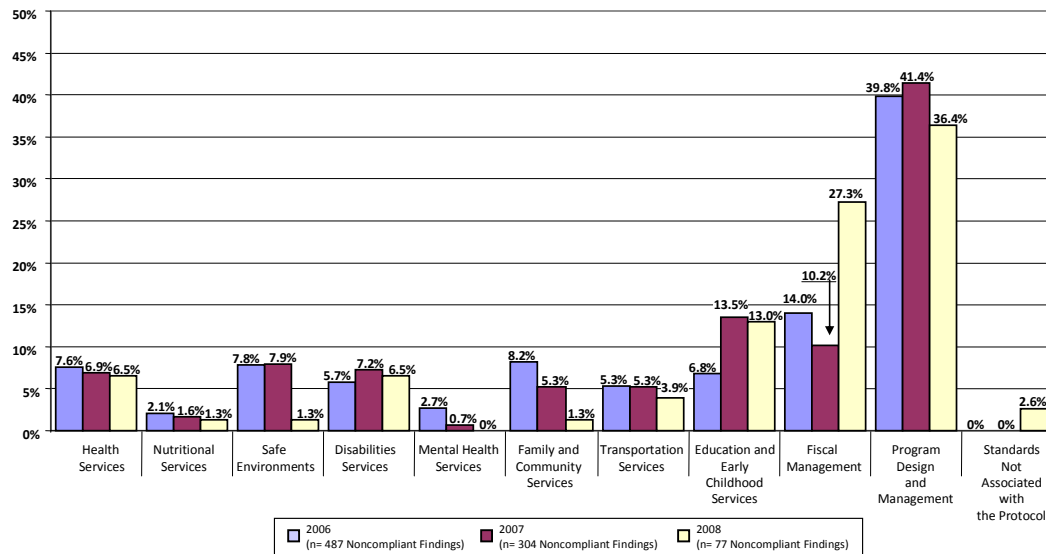
Thanks to you . . .

Head Start continues to be a leader in  
early education for all children.

---

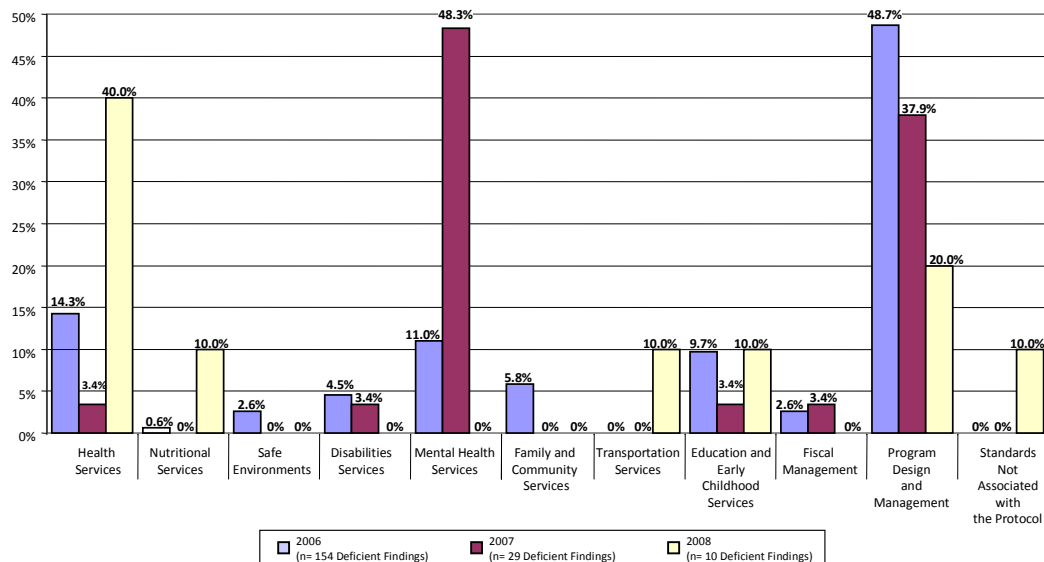
## AI/AN FY 2006 to FY 2008 Noncompliant Findings by Protocol Section

EXHIBIT 9: FY 2006 to FY 2008 AI/AN  
NONCOMPLIANT FINDINGS BY PROTOCOL SECTION



## AI/AN FY 2006 to FY 2008 Deficient Findings by Protocol Section

EXHIBIT 10: FY 2006 to FY 2008 AI/AN  
DEFICIENT FINDINGS BY PROTOCOL SECTION



# AI/AN vs. Nation—Most Frequently Cited Performance Standards, FY 2006 to FY 2008

## EXHIBIT 11: MOST FREQUENTLY CITED STANDARDS IN FY 2006 TO FY 2008 TRIENNIAL/FIRST-YEAR REVIEWS

### AI/AN GRANTEES

Rank	Performance Standard	Protocol Section	Protocol Subsection	Grantees with Citation (n 105)	
				n	%
1	1304.51(i)(2)	Program Design and Management	Ongoing Monitoring	28	26.7%
2	1304.20(b)(1)	Health Services	Providing Health Services	23	21.9%
3	A-133(320)(a)	Fiscal Management	Financial Reporting	21	20.0%
3	1310.21(a)	Education and Early Childhood Development Services	Approach to Education and Early Childhood Development Services	21	20.0%
3	1304.24(a)(2)	Mental Health Services	Implementation of Mental Health Services	21	20.0%
6	1304.52(j)(1)	Program Design and Management	Human Resources	18	17.1%
6	1304.51(i)(1)	Program Design and Management	Self-Assessment	18	17.1%
8	1304.51(g)	Program Design and Management	Record-Keeping and Reporting	16	15.2%
8	1305.7(b)	Program Design and Management	Eligibility, Enrollment, and Attendance	16	15.2%
10	1304.24(a)(3)(i)	Mental Health Services	Implementation of Mental Health Services	15	14.3%
10	1304.52(i)	Program Design and Management	Human Resources	15	14.3%

### GRANTEES NATIONWIDE

Rank	Performance Standard	Protocol Section	Protocol Subsection	Grantees with Citation (n 1008)	
				n	%
1	1304.51(i)(2)	Program Design and Management	Ongoing Monitoring	157	15.6%
2	1304.53(a)(7)	Safe Environments	Facilities, Materials, and Equipment	121	12.0%
3	1310.21(a)	Education and Early Childhood Development Services	Approach to Education and Early Childhood Development Services	116	11.5%
4	1304.20(b)(1)	Health Services	Providing Health Services	111	11.0%
5	1305.3(c)(3)	Program Design and Management	Planning	101	10.0%
6	1304.51(g)	Program Design and Management	Record-Keeping and Reporting	92	9.1%
7	1304.53(a)(10)(x)	Safe Environments	Facilities, Materials, and Equipment	85	8.4%
8	1304.52(j)(1)	Program Design and Management	Human Resources	82	8.1%
9	1304.52(i)	Program Design and Management	Human Resources	76	7.5%
10	1305.7(b)	Program Design and Management	Eligibility, Enrollment, and Attendance	74	7.3%

Note: Performance standards that are listed on both the list of most frequently cited standards for AI/AN grantees and grantees nationwide are highlighted in red.